

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ENTROPIC COMMUNICATIONS, LLC,)
Plaintiff,)

vs.)

CHARTER COMMUNICATIONS, INC.,)
Defendants.)

Case No.:

2:22-cv-00125-JRG

VIDEO-RECORDED REMOTE DEPOSITION OF
STEVEN GOLDBERG, Ph.D.EE
Cupertino, California
Tuesday, August 22, 2023; 7:58 a.m.

TAKEN IN BEHALF OF THE PLAINTIFFS

REPORTED BY:

Victoria A. Guerrero, CSR, RDR, RMR, CRR

Job No. 6060655

Pages 1 through 263

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ENTROPIC COMMUNICATIONS, LLC,)
 Plaintiff,)
) Case No.:
 vs.) 2:22-cv-00125-JRG
)
CHARTER COMMUNICATIONS, INC.,)
 Defendants.)
_____)

BE IT REMEMBERED that, pursuant to Federal Rules of Civil Procedure, the deposition of STEVEN GOLDBERG, Ph.D.EE was taken before Victoria A. Guerrero, California Certified Shorthand Reporter, Registered Diplomat Reporter, Registered Merit Reporter, and Certified Realtime Reporter, on Tuesday, August 22, 2023, commencing at the hour of 7:58 a.m., the witness responding to questions by videoconference from Cupertino, California; the questions being propounded and proceedings reported remotely via videoconference.

1 R E M O T E A P P E A R A N C E S :
2 F O R T H E P L A I N T I F F :

3 K & L G A T E S L L P
J A M E S S H I M O T A
4 S A M U E L P . R I C H E Y
70 W e s t M a d i s o n S t r e e t , S u i t e 3 3 0 0
5 C h i c a g o , I l l i n o i s 6 0 6 0 2
3 1 2 . 3 7 2 . 1 1 2 1
6 j a m e s . s h i m o t a @ k l g a t e s . c o m
s a m u e l . r i c h e y @ k l g a t e s . c o m

7

8 F O R T H E D E F E N D A N T :

9 A R N O L D & P O R T E R
D A V I D B E N Y A C A R
10 2 5 0 W e s t 5 5 t h S t r e e t
N e w Y o r k , N e w Y o r k 1 0 0 1 9
11 d a v i d . b e n y a c a r @ a r n o l d p o r t e r . c o m

12

13

14 A L S O P R E S E N T :

15 S e a n G r a n t , V i d e o g r a p h e r

16

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Tuesday, August 22, 2023

Victoria A. Guerrero, CSR, RPR, RMR, CRR

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* * *

1 Tuesday, August 22, 2023; 7:58 a.m.

2 Cupertino, California

3 ooOoo

4 THE VIDEOGRAPHER: Good morning. We're 07:58:32
 5 going on the record. The time is 7:58 a.m. and 07:58:33
 6 the date is August 22nd, 2023. Please note 07:58:37
 7 that this deposition is being conducted 07:58:42
 8 virtually. Quality of recording depends on the 07:58:44
 9 quality of camera and internet connection of 07:58:47
 10 participants. What is seen from the witness 07:58:49
 11 and heard is what will be recorded. Audio and 07:58:51
 12 video recording will continue to take place 07:58:55
 13 unless all parties agree to go off. 07:58:57

14 This is Media Unit 1 of the video-recorded 07:58:59
 15 deposition of Dr. Steven Goldberg taken by 07:59:02
 16 counsel for the plaintiff in the matter of 07:59:04
 17 Entropic Communications, LLC., vs Charter 07:59:07
 18 Communications, Inc., filed in the United 07:59:07
 19 States District Court for the Eastern District 07:59:11
 20 of Texas, Marshall Division, Case No. 07:59:13
 21 2:22-cv-00125 and is being conducted remotely 07:59:17
 22 using virtual technology. 07:59:27

23 My name is Sean Grant, videographer, of 07:59:30
 24 Veritext. The court reporter is Victoria 07:59:31
 25 Guerrero also of Veritext. I'm not related to 07:59:33

Page 8

1 any party, nor am I financially interested in 07:59:35
2 the outcome. 07:59:37

3 If there are any objections to proceeding, 07:59:38
4 please state them at the time of your 07:59:39
5 appearance. Counsel and all present, including 07:59:42
6 remotely, will now state their appearances and 07:59:43
7 affiliations for the record beginning with the 07:59:46
8 noticing attorney. 07:59:48

9 MR. SHIMOTA: James Shimota of the law 07:59:52
10 firm K & L Gates appearing on behalf of 07:59:54
11 Entropic Communications LLC, joined as well by 07:59:57
12 my colleague Pat Richey also from the law firm 07:59:59
13 K & L Gates. 08:00:04

14 MR. BENYACAR: David Benyacar of the 08:00:05
15 Arnold & Porter firm for the Charter 08:00:08
16 defendants. 08:00:10

17 THE VIDEOGRAPHER: Thank you. Will the 08:00:11
18 certified court reporter please swear in the 08:00:12
19 witness. 08:00:13

20 ooOoo 08:00:13

21 Whereupon, STEVEN GOLDBERG, Ph.D.EE, having 08:00:13
22 first been sworn by the California 08:00:13
23 Certified Shorthand Reporter, testified 08:00:13
24 under oath as follows: 08:00:13

25 /// 08:00:13

1 | been talking about. 11:42:47

2	A	You mean element 26?	11:42:48
---	---	----------------------	----------

3	Q	Element 26. Right. I misspoke. Right.	11:42:53
---	---	---------------------------------------	----------

4	Right.	11:42:55
---	--------	----------

5 | You know, you use figure 26 or figure 1 in 11:42:56

6 | your report, right? That's part of your opinions, 11:43:01

7 | correct? 11:43:04

8	A	I talk about element 26, right, in my	11:43:05
---	---	---------------------------------------	----------

```
9 | report. 11:43:12
```

10	Q	Yeah. So I'm just wondering where you	11:43:12
----	---	---------------------------------------	----------

11 would point to the cable modem engine processor, the 11:43:14

```
12 DOCSIS MAC controller, and the DOCSIS MAC processor.      11:43:19
```

```
13 | What elements would you -- if you had to explain 11:43:22
```

14	this to a jury and say where those things are in	11:43:25
----	--	----------

```
15 | block -- element 26, block 26, where would you show 11:43:28
```

16	those things to them or what would you draw circles	11:43:32
----	---	----------

17	around?	11:43:35
----	---------	----------

18	A	Yeah. I talk about that in some detail in	11:43:36
----	---	---	----------

19 my report. And you asked a much broader question 11:43:38

20 just now. And so I think it's important to go to my 11:43:43

21 report and address that. I've already stated that 11:43:48

22 figure 1 -- I think it's figure 1, right? It is 11:43:55

```
23 | figure 1. Is a functional description. 11:43:57
```

24	I went on to say that, a POSITA guided by	11:44:03
----	---	----------

25 statements made by Dong would understand that those 11:44:06

1 functional elements are implemented with at least 11:44:09
2 one processor programs with software. I say that in 11:44:12
3 paragraph 54. 11:44:18

4 Q Uh-huh. 11:44:19

5 A And then you asked me again in block 26, I 11:44:20
6 think you just asked about more things in this 11:44:27
7 latest question about the processors. I spend a lot 11:44:29
8 of time, and I think it might be appropriate now to 11:44:39
9 go to section -- in order to answer your question, 11:44:42
10 so we need to go to the claim construction. 11:45:04

11 Can you go to my paragraph 77 in my section 11:45:06
12 under USC, 35 USC 112. I talk quite a bit about 11:45:10
13 what the -- the Court's construction. And the issue 11:45:25
14 as to whether in the cable modem functions 11:45:35
15 whether -- and I'm quoting from my report, 11:45:41
16 paragraph 77. 11:45:44

17 The Court further interpreted the claim 11:45:45
18 phrase, quote, wherein the cable modem functions 11:45:48
19 performed by the cable modem engine are completely 11:45:51
20 partitioned from the home networking functions 11:45:54
21 performed by the data networking engine to mean, 11:45:56
22 wherein, the cable modem and data networking engine 11:46:01
23 are not necessarily physically separate, but are 11:46:04
24 functionally separate, such that the cable modem 11:46:07
25 functions are performed only by the cable modem and 11:46:11

1 the home networking functions are performed only by 11:46:13
2 the data networking engine. 11:46:17

3 So I want to point out that the Court 11:46:19
4 basically noted they don't have to be physically 11:46:31
5 separate. So when you say draw circles around them, 11:46:36
6 it doesn't -- that doesn't -- it's not consistent 11:46:40
7 with what the Court described. 11:46:44

8 Q Okay. So you're talking about -- there 11:46:47
9 you're talking about the home networking engine and 11:46:50
10 the cable networking engine, right? 11:46:52

11 A No. I'm talking here about -- let's go 11:47:03
12 even further. Here I talk about, in paragraph 79, 11:47:06
13 although the Court ruled that a DOCSIS MAC and 11:47:21
14 DOCSIS controller are well known by those of 11:47:24
15 ordinary skill-in-the-art, I disagree. 11:47:27

16 The Court itself stated, quote, the absence 11:47:30
17 of involvement of the DOCSIS controller in this 11:47:33
18 particular operation does not preclude the DOCSIS 11:47:35
19 controller from being involved with other MAC 11:47:37
20 functions. 11:47:39

21 Consistent with the Court's statement, the 11:47:41
22 industry has a general sense of what this term means 11:47:43
23 but provides no clear delineation between the two. 11:47:47
24 And I go on about another topic. 11:47:50

25 But the punchline is, and the important 11:47:52

1 opinion here is, is that the Court's construction 11:47:55
2 makes it difficult or impossible to draw circles -- 11:48:00
3 impossible, basically, to draw circles around the 11:48:04
4 MAC processor and the DOCSIS controller that's 11:48:07
5 specified. 11:48:13

6 And I go on to say in paragraph 80, There 11:48:14
7 is not any written description or enablement on how 11:48:17
8 to perform the control limitation, "The DOCSIS mass 11:48:20
9 processor configured to process downstream PDU 11:48:25
10 packets and forward the processed packets directly 11:48:29
11 to the data networking engine without the 11:48:33
12 involvement of the DOCSIS controller." 11:48:35

13 Q Okay. Let's just flip back to page 12 of 11:48:40
14 your report there. You've got the Court's 11:48:42
15 constructs there. 11:48:44

16 A Okay. 11:48:50

17 Q You see DOCSIS MAC processor and DOCSIS MAC 11:48:51
18 controller there at the bottom, right? 11:48:54

19 A Yes. 11:48:56

20 Q Where is all that stuff about you can't 11:48:56
21 separate the functions of the DOCSIS MAC processor 11:48:58
22 and the DOCSIS MAC controller? Where is that? 11:49:01

23 Where are you getting that from? I don't see it. 11:49:03

24 A No. The -- 11:49:10

25 MR. BENYACAR: Objection. Argumentative. 11:49:11

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1 that there is no clear distinction between the 12:07:23
2 DOCSIS MAC functions and the DOCSIS controller 12:07:26
3 functions; you see that? 12:07:28

4 A Yes. In reading 66 or 67? 12:07:44

5 Q Yeah, 66. There's no clear functional 12:07:49
6 delineation between the two terms? 12:07:51

7 A That's what I -- I said there's no clear 12:07:55
8 distinction, yes. 12:08:00

9 Q Right. And that's not in the Court's 12:08:04
10 construction, it's in the Court's opinion, correct? 12:08:06
11 You're quoting from the Court's opinion, that's 12:08:09
12 claim construction opinion, right? 12:08:12

13 The absence of involvement of the DOCSIS 12:08:15
14 controller in this particular operation does not 12:08:17
15 preclude the DOCSIS controller from being involved 12:08:21
16 with other MAC functions; do you see that? 12:08:23

17 A Yes. And just to answer your question, I'm 12:08:26
18 not an attorney, I know we've established that, and 12:08:28
19 that the Court did construe plain and ordinary 12:08:33
20 meaning. And what I was trying to do is I'm working 12:08:37
21 with the Court's construction. I'm just explaining 12:08:39
22 the issue of plain and ordinary meaning. 12:08:42

23 Q Right. But you're quoting something there, 12:08:47
24 right? From the Court, right? The quote is the 12:08:49
25 absence of involvement of the DOCSIS controller in 12:08:51

1 this particular operation does not preclude the 12:08:53
2 DOCSIS controller from being involved with other MAC 12:08:56
3 functions, right? That's from the Court, isn't it? 12:08:59

4 A Yes. 12:09:01

5 Q That's the Court's opinion, right? 12:09:03

6 A You're asking me a legal question. I can't 12:09:06
7 answer what it actually -- it came from the Court. 12:09:09

8 Q Well, your opinions here are intended to be 12:09:12
9 what, you know, to describe the opinions you're 12:09:15
10 going to offer to the jury at trial, correct? 12:09:16
11 Right? 12:09:19

12 A Yes. 12:09:20

13 Q And so I take it, then, that you're going 12:09:22
14 to explain to the jury that based on the Court's -- 12:09:25
15 the information provided by the Court, there's no 12:09:28
16 clear delineation between the DOCSIS MAC processor 12:09:33
17 and the DOCSIS MAC controller, right? That's going 12:09:36
18 to be one of your opinions to the jury? 12:09:38

19 A My opinion is very close to that stated in 12:09:40
20 at least paragraph 66, yes. 12:09:45

21 Q Okay. And that -- and as a consequence of 12:09:47
22 that, you're going to say this is how I analyzed 12:09:50
23 Dong, right? 12:09:52

24 As a consequence of a lack of a clear 12:09:55
25 delineation occasioned by the Court's analysis, this 12:09:58

1 is the way in which I analyzed Dong, the cable modem 12:10:01

2 engine block 26? 12:10:05

3 A And that's kind of what I said in the first 12:10:07

4 sentence of paragraph 67. 12:10:10

5 Q Okay. Just not to put too fine a point on 12:10:17

6 it, you're not going to show up at trial and put 12:10:19

7 figure 1 up on an ELMO for a jury and draw a circle 12:10:22

8 around something and say this is the DOCSIS MAC 12:10:26

9 processor and draw another circle and say there's 12:10:29

10 the DOCSIS MAC controller, right, block 26? 12:10:31

11 MR. BENYACAR: Objection. Misstates the 12:10:34

12 testimony. 12:10:35

13 THE WITNESS: That's not what I said. I 12:10:36

14 gave an example of how Dong could be 12:10:42

15 partitioned that meets the claim language. 12:10:45

16 Because the claim language also needs to 12:10:46

17 include bypassing, seconding PDU packet -- I'm 12:10:48

18 paraphrasing here. That bypass the DOCSIS -- 12:10:52

19 that bypass the DOCSIS controller. 12:10:56

20 And so my testimony has been that there -- 12:11:02

21 that Dong does disclose a DOCSIS MAC and DOCSIS 12:11:07

22 control partition such that PDU packets bypass 12:11:19

23 the DOCSIS controller. 12:11:23

24 BY MR. SHIMOTA: 12:11:24

25 Q So where is the partition? You said that 12:11:24

1 A I do. 14:05:45

2 Q And can you tell me where it is in Coyne 14:05:46

3 there's an explicit disclosure of a plurality of 14:05:49

4 television channels? 14:05:51

5 A Okay. Well, first of all, Coyne says it 14:06:04

6 can be used in any application. 14:06:13

7 Second of all, I'll come down, so in 251 I 14:06:15

8 talk about, Coyne teaches that a device called a 14:06:20

9 combiner combines incoming radiofrequency signals, 14:06:23

10 which are analog signals, to a wideband or ultra 14:06:27

11 wideband spectral space and outputs them to an 14:06:30

12 analog-to-digital converter. 14:06:34

13 This converter provides a digital 14:06:36

14 representation of the combined signal to the 14:06:38

15 channelizer which converts, that is demultiplexes, 14:06:42

16 that digital signal into one or more channel 14:06:46

17 outputs. 14:06:49

18 Then I go on. This channelizer outputs to 14:06:50

19 a digital signal spanning an entire television 14:06:53

20 spectrum, quote/unquote. Per Coyne, if channelizer 14:06:55

21 240 is used to generate multiple channel outputs, 14:07:03

22 each may span a desired portion of the entire 14:07:06

23 frequency -- entire frequency spectrum of interest. 14:07:09

24 Coyne also discloses this channelizer has a 14:07:14

25 filter bank in which each filter possesses a pass 14:07:17

1 band spanning some portion of the frequency spectrum 14:07:20
2 of interest. Coyne instructs that the pass bands of 14:07:24
3 all filters span the complete spectrum of interest. 14:07:28
4 Now, then I go on and say, a POSITA would 14:07:32
5 understand that the complete spectrum of interest, 14:07:37
6 in quotes, includes the entire television spectrum, 14:07:40
7 in quotes, claimed by the '008 patent. Although, 14:07:43
8 the '008 patent does not define the term, quote, 14:07:48
9 entire television spectrum, it states that the, 14:07:51
10 quote, entire cable downstream occurs at frequencies 14:07:54
11 in a range from approximately 55 megahertz to 102 14:07:58
12 megahertz. 14:08:04
13 And that for satellite television, the 14:08:06
14 frequency range is 1 gigahertz to 2 gigahertz, '008 14:08:09
15 556 to 565. The '008 patent does not disclose a 14:08:14
16 television spectrum with frequencies outside these 14:08:18
17 ranges. 14:08:20
18 So these frequencies disclosed by Coyne. 14:08:21
19 He teaches that some embodiment -- Coyne teaches 14:08:25
20 that some embodiments of the invention may be 14:08:29
21 wideband. Which we talked about, e G up to 14:08:31
22 5-megahertz or ultra wideband up to two gigahertz. 14:08:37
23 Coyne knows these frequencies may be 14:08:42
24 divided up in different ways. And I talk some more. 14:08:44
25 So in my opinion, a POSITA would readily understand 14:08:48

1 that this range starts at 1 megahertz and ends at 14:08:52
2 512, even though Coyne does not specifically use 14:08:55
3 this language. 14:08:59

4 A POSITA would readily extrapolate from 14:09:00
5 this example to determine that the particular range 14:09:02
6 as disclosed by Coyne, which is as great as 2 14:09:05
7 gigahertz, constitute the entire television spectrum 14:09:09
8 claimed by the '008. 14:09:13

9 So a lot of words there, but you can see 14:09:14
10 what I said at the end, that a POSITA would readily 14:09:16
11 extrapolate. 14:09:19

12 Q Thank you for reading your report to me. I 14:09:21
13 see at the end you talk about the entire television 14:09:23
14 spectrum. But my question before you read your 14:09:26
15 report to me was, where does Coyne describe anywhere 14:09:28
16 television channels? 14:09:33

17 Can you point me to that specifically? 14:09:35

18 And you don't need to read your report to 14:09:37
19 me again. Tell me where it is in Coyne where they 14:09:39
20 talk about television channels. 14:09:42

21 A He talks about spectrum, he talks about 14:09:44
22 channelizing, and he talks about that it can be used 14:09:46
23 anywhere. 14:09:49

24 Q You understand TV channels to mean, like, 14:09:53
25 ESPN and HBO and things like that, right? Context 14:09:55

1 do this function, you look at mixers. 16:02:47

2 Q Is there anything else you would look at to 16:02:53

3 do that function that you're aware of? You say you 16:02:55

4 haven't done that analysis. 16:02:55

5 A Not that I know of. Oh, I didn't say I 16:02:56

6 haven't done that. I mean, I said I haven't done 16:02:59

7 the exhaustive search of what you could do. But I 16:03:01

8 absolutely, throughout my career, did this. And you 16:03:04

9 always look to mixers. In my -- again, in the 16:03:07

10 commercial and industrial applications related to 16:03:15

11 Zhang and certainly the '362. 16:03:18

12 Q Okay. Well, looking at paragraph 374 of 16:03:23

13 your report, do you see that? I think that's a 16:03:31

14 summary of your opinions. Invalidity over Zhang or 16:03:37

15 Zhang in combination with Favrat; do you see that? 16:03:40

16 A 37 what? 16:03:46

17 Q 374 of your report on page 111. 16:03:59

18 A Okay. I'm there. That's 374 is the 16:03:59

19 beginning of the section. 16:04:05

20 Q Yeah, right. I think it's just a summary 16:04:06

21 of what you opine, ultimately. 16:04:08

22 A Yeah. 16:04:17

23 Q Am I correct you don't offer an opinion in 16:04:17

24 which you combine Zhang with the Li reference in 16:04:19

25 terms of an obviousness combination? 16:04:23

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1	A	That's correct. Li was brought in as	16:04:38
2		support for the use of a mixer. Just that it's	16:04:40
3		obvious to a person of ordinary skill in the art. I	16:04:44
4		don't think any of my headings in my report -- but	16:04:47
5		I'll double-check that. Let me just -- before I	16:04:52
6		give you, quote/unquote, my final answer.	16:04:55
7		Well, I state that in my opinion claims 11	16:05:33
8		and 12 -- in my paragraph 374 -- are invalid --	16:05:36
9		claims 11 and 12 of the '362 patent are invalid over	16:05:41
10		US Patent No. -- and I'll shorten it -- '372 Zhang	16:05:47
11		alone, or Zhang in combination with US Patent No.	16:05:52
12		'792 Favrat.	16:05:54
13		It's also my opinion claims 11 and 12 of	16:06:01
14		the '362 are invalid over US Patent '901, Dauphinee.	16:06:03
15		That's my opinion.	16:06:10
16	Q	Right. So I guess not to be -- put too	16:06:11
17		fine a point on it, but you don't offer an opinion	16:06:15
18		that the claims -- claims 11 and 12 of '362 patent	16:06:18
19		are obvious when combining Zhang with Li, correct?	16:06:23
20	A	I think Li -- Li was used -- and if you'll	16:06:46
21		look at the last sentence in 393, Li was used as	16:06:52
22		support to, quote/unquote, and I quote from my	16:06:56
23		report, confirms my understanding that Zhang's	16:06:58
24		frequency block converter are mixers or mixer	16:07:01
25		modules within the meaning of the '362 patent.	16:07:05

1 That's how Li was used. 16:07:08

2 Q Right. You're not offering an opinion that 16:07:16
3 one of ordinary skill-in-the-art would combine Zhang 16:07:18
4 and Li to find that the '362 claims 11 and 12 are 16:07:22
5 obvious, right? 16:07:26

6 A I don't think that's anywhere in my report. 16:07:27
7 I said how I used Li. Li confirms my understanding. 16:07:30

8 Q Okay. Thank you. If you could look at 16:07:42
9 paragraph 389. I think we already talked about this 16:07:44
10 a little bit. And there there's the reference that 16:07:47
11 you talked about, the undesired -- we talked earlier 16:07:51
12 about undesired channels; do you remember that? 16:07:52

13 A We did. 16:07:55

14 Q Right. Can you explain to me in there 16:07:58
15 where it is that Zhang discloses undesired channels 16:08:01
16 explicitly? 16:08:05

17 A Sure. In 389 it says selects one or 16:08:07
18 more -- this is the quote from Zhang. Selects one 16:08:28
19 or more of the RF channels, D1 to DM, from one or 16:08:34
20 more of the digital RF channels, C1 through CN. So 16:08:38
21 there's a larger grouping and a smaller grouping and 16:08:47
22 there's a selection process. 16:08:50

23 Q Yeah. But why does that explicitly mean 16:08:55
24 that they are undesired channels? How does that 16:08:57
25 follow? 16:09:01

1 A All right. Give me one second, please. 16:09:01

2 Q Sure. 16:09:04

3 A Well, paragraph 6 of Zhang, lines 18 16:10:46

4 through 34, you know, give more color. And there's 16:10:51

5 even -- it gets pretty specific about -- let's just 16:10:56

6 say there's 35 separate RF channels, C1 to C35. I'm 16:10:59

7 reading from line 29 of column 6. 16:11:08

8 For example, in figure 6 there are 35 16:11:11

9 separate RF channels, C1 to C35. Of those channels, 16:11:15

10 20 RF channels, D1 to D20, are selected. Those 20 16:11:19

11 selected RF channels are sent to a set of 16:11:25

12 demodulators for demodulation. 16:11:29

13 I think a person of ordinary 16:11:33

14 skill-in-the-art would understand the ones you 16:11:35

15 selected were the desired ones and the other ones 16:11:36

16 were undesired. You didn't need them. 16:11:40

17 Q Well, wouldn't it be possible that you 16:11:42

18 wouldn't have enough -- there would be some order 16:11:44

19 where you would have less demodulators than you 16:11:46

20 would have channels? 16:11:49

21 A Let me just go to my report. All right. I 16:12:02

22 just need a minute here. I'm going back to the 16:12:39

23 '362. In the '362 it almost is a perfect map 16:12:42

24 between Zhang and the '362. 16:13:13

25 If you look it says, line 29, column 1, 16:13:16

1 Because the swath of channels is not contiguous, 16:13:21
2 this swath includes the desired channels as well as 16:13:24
3 the undesired channels. The demodulator employs a 16:13:29
4 high speed data converter to capture the swath of 16:13:32
5 desired and undesired channels in the digital domain 16:13:34
6 and subsequently filters out the desired channels. 16:13:37
7 That's what Zhang does. It's almost a 16:13:41
8 direct -- 16:13:47
9 Q Where does it say that in Zhang? 16:13:48
10 A Oh, I was just there. I'll go back to 16:13:50
11 Zhang. Yeah. It was column 6. It says, line 31 16:13:53
12 through 34, of those RF channels, 20 RF channels, D1 16:14:30
13 to D20, are selected. Those selected channels are 16:14:35
14 sent to a set of demodulators. That's exact -- 16:14:38
15 that's not exactly, but that's almost directly what 16:14:41
16 '362 says. 16:14:46
17 Q Right. There's two pieces in there. It 16:14:53
18 doesn't say that there's -- that the undesired -- 16:14:55
19 that nothing is done with the other channels, right? 16:14:57
20 That those other channels are undesired, correct? 16:15:01
21 Anywhere in Zhang. 16:15:03
22 A Well -- 16:15:06
23 Q You're inferring that, correct? 16:15:07
24 A Zhang -- I did a search on. My favorite 16:15:10
25 thing, just do the search on Zhang. And I think if 16:15:16